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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

MERRILL LYNCH BUSINESS
FINANCIAL SERVICES INC.,

Plaintiff,

06 Civ. 4802 (DMC)

vs.

AMENDMENT TO VERIFIED COMPLAINT

ARTHUR KUPPERMAN; E. ROSS
BROWNE; PAULETTE KRELMAN,
PGB INTERNATIONAL, LLC; and JP
MORGAN CHASE BANK, NATIONAL
ASSOCIATION,

Defendants.

Plaintiff Merrill Lynch Business Financial Services Inc. ("MLBFS"), having a principal address at 222 North LaSalle Street, 17th Floor, Chicago, IL 60601, for its Amendment To Verified Complaint:

1. hereby amends the caption to read as set forth above.

2. hereby adds the following paragraph:

9B. Defendant JP Morgan Chase Bank, National Association ("Chase") is a National Banking Association organized under the laws of the United States. Pursuant

to 28 U.S.C.A. §1348 and *Wachovia Bank, National Association v. Schmidt*, 126 S.Ct. 941 (2006), for diversity jurisdiction purposes, Chase is "located" in the State of Ohio, the place designated in its Articles Of Association as the locus of its main office.

3. hereby amends paragraph 83 to read as follows:

83. By virtue of such notice, because PGB is PITTRA's alter ego, and for other reasons, MLBFS has the right to enforce its security interest against the assets transferred and the proceeds thereof, ahead of, and with priority over any and all other creditors of PGB, including Chase.

4. and hereby amends paragraph F of the Wherefore clause to read as follows:

F. Ordering PGB to account for all assets of PITTRA, whether acquired from PITTRA or the proceeds thereof or otherwise, and to turn over same to MLBFS, with MLBFS deemed to have a first priority right to such assets ahead of all other creditors of PGB, including Chase;

Respectfully submitted,

BRESSLER, AMERY & ROSS, P.C.
Attorneys for Plaintiff

By: 
George R. Hirsch

Dated: October 20, 2006